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June 30, 2022

Via email & ECF
Honorable Laura Taylor Swain
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. John Taylor*
17cr01(LTS)

Dear Judge Swain:

Mr. Taylor is scheduled to appear before Your Honor for sentencing on July 19th at noon. According to the Court's scheduling order my sentencing submission is due on July 5th. Due to my engagement in a recent trial, I am backed up with written work and realize I have two other written submission due on the same day. In addition, I do plan to take some time off from work over the holiday weekend.

Accordingly, I respectfully request until September 7th to file my sentencing submission. Assistant United States Attorney, Jonathan Rebeld has consented provided he likewise has an additional two days to submit his sentencing memo which is currently due on the July 12th.

Respectfully submitted,
/s/
Donna R. Newman
Cc: All Counsel of Record via ECF

